

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION**

UNITED STATES OF AMERICA,)
v.) Case Number 07 CR 799
HUBERT CHOW,) Judge Ronald A. Guzman
Defendant.)

UNOPPOSED PETITION TO EXPAND CONDITIONS OF BOND

NOW COMES the Defendant, HUBERT CHOW, by and through his attorneys, AZULAYSEIDEN LAW GROUP and for his unopposed petition to expand conditions of bond, states as follows:

1. On or about February 13, 2008, the Defendant HUBERT CHOW ("Chow") was charged with conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 USC, § 846 and 18 USC § 2.

2. On or about February 26, 2008, the court ordered Chow released on his own
recognition. See Order setting Conditions of Release attached as Exhibit A.

3. Amongst the conditions of bond, Chow's travel is limited to the Northern District of Illinois. See exhibit A.

4. On or about June 30, 2008, Defendant pled guilty to Count 1 of the indictment pursuant to a plea agreement. Defendant remains out on bond under the previous set of conditions entered by this Court.

5. At the time the bond was entered Chow was not gainfully employed. He has now obtained employment through a friend by the name of Emil Miglieri. Emil owns a trucking business called Lin's Trucking.

6. Chow has been employed by Lin's Trucking as a helper earning \$10 per hour.

7. As a part of his job he will be required to travel to Indiana, specifically to unload goods in areas such as Hammond, Indiana.

8. Chow requests that because of travel requirements for his job that this Court enters an order expanding travel restrictions to the Northern District of Indiana.

9. Chow has fully complied with the terms of his bond and has made every required Court appearance in this matter.

10. Counsel has spoken with the attorney for the Government who is unopposed to this motion.

WHEREFORE, Chow respectfully requests that this Honorable Court grant his petition to expand conditions of bond, or for any such additional relief as this Court deems fair and just.

Dated: July 31, 2008

Respectfully submitted,

/s/ Linda M. Babich
Linda M. Babich
AZULAYSEIDEN LAW GROUP
Attorneys for the Defendant
205 N. Michigan Ave. - 40th Floor
Chicago, Illinois 60601
Telephone Number: 312-832-9200
Attorney Number: 6242459